

1 Counsel Appear on the Following Page
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**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

9 Mohan Gil, Rodney Carr, Tony
10 Daniel, and Jermaine Wright,
11 individually, on behalf of others
12 similarly situated, and on behalf of
the general public,

13 Case No. C 07-06414 RMW (HRL)

14 Plaintiffs,
15 v.
16 **[PROPOSED] CASE
17 MANAGEMENT ORDER**
18

19 Soletron Corporation, Flextronics
20 International, USA, Inc., and DOES
21 1-10 inclusive,

22 Defendants.
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Honorable Ronald M. Whyte
Complaint Filed: December 19, 2007

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35 Attorneys for DEFENDANTS

1 On April 18, 2008, Jessica J. Clay, Counsel for Plaintiffs, and Robert J.
2 Wilger, Counsel for Defendants Solelectron Corporation and Flextronics
3 International, USA, Inc., (hereinafter referred to collectively as "Defendants")
4 appeared for a case management conference. It is hereby ordered as follows:

- 5 1. Plaintiffs will file and serve their Motion for Conditional Certification on
6 or before July 1, 2008;
- 7 2. Plaintiffs will file and serve their Motion for Rule 23 Class Certification
8 on or before May 1, 2009;
- 9 3. The Parties will complete discovery on the merits on or before June 1,
10 2009;
- 11 4. The Parties will complete all expert discovery on or before June 12, 2009;
- 12 5. The Parties will designate any expert witnesses and disclose any expert
13 reports/opinions on or before April 1, 2009;
- 14 6. The Parties will file and serve any non-dispositive motions on or before
15 July 1, 2009;
- 16 7. Any Summary Judgment Motions will be heard on September 4, 2009;
- 17 8. The Parties will be ready-for-trial on November 30, 2009;
- 18 9. The Parties will participate in an ADR phone conference on August 7,
19 2008 at 9:30 a.m.;
- 20 10. Discovery in this case shall be limited as follows:
 - 21 a. Each side is limited to 60 hours of depositions;
 - 22 b. Plaintiffs may ask Interrogatories of Defendants related to their
23 policies and practices; and
 - 24 c. Defendants may ask Interrogatories of Plaintiffs related to the
25 Plaintiffs' biographical and work-history.

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2 Dated: April 21, 2008

NICHOLS KASTER & ANDERSON, PLLP

3 By: s/Jessica J. Clay

4 Jessica J. Clay

5 ATTORNEYS FOR PLAINTIFFS AND THE
PUTATIVE CLASSES

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7
8 Dated: April 21, 2008

LITTLER MENDELSON,
A Professional Corporation

9 By: Robert J. Wilger

10 Robert J. Wilger

11 ATTORNEYS FOR DEFENDANTS

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15 IT IS SO ORDERED:

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17 The Honorable Robert M. Whyte